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December 17, 2024

**Via ECF**

Honorable Evelyn Padin  
United States District Court Judge  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: HANGANG GLOBAL SHIPPING CO., LTD. v.  
DELTA CORP SHIPPING PTE LTD *et al*  
D. NJ 2:24-cv-11111-EP-MAH

Dear Judge Padin,

We represent the Plaintiff Hangang Global Shipping Co., Ltd in the above-referenced action, and write to follow up on our Rule B application.

Specifically, we are seeking the attachment of Defendant Delta Corp Shipping Pte Ltd.'s property, which is believed to be in this District. In the Complaint and related papers, we alleged the breach of a maritime contract, confirmed that we cannot locate the presence of the Defendant in the District, and have reason to believe that the Defendant's property is likely held by the named garnishee bank in the District. Our application included specific proposed orders, the reasoned basis for these orders to issue, and a draft process of maritime attachment and garnishment. Pursuant to Rules B and E of the Federal Rules of Civil Procedure, this Honorable Court and the Clerk of the Court should issue these respective orders and process.

To be clear, the resulting Rule B orders and process should issue *ex-parte* and soon after the application is filed. In terms of exigent circumstances, the Defendant may learn of this application and purposely move property and/or close bank accounts in this District before the garnishee can be served with the orders and process. As a matter of perspective, in the *Hays Tug* decision we cited, this Court granted the Rule B motions the same day that the lawsuit was

**MONTGOMERY McCRACKEN WALKER & RHOADS LLP**

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MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER

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filed. *See Hay Tug & Launch Services, Inc. v. Draw Events, LLC*, 364 F.Supp.3d 365, 367 (D.N.J. 2019).

If there are any questions, please do not hesitate to contact us. We can appear by phone or in-person. Otherwise, we thank Your Honor in advance for your consideration and assistance.

Respectfully submitted,

Montgomery McCracken  
Walker & Rhoads, LLP

/s/ Timothy Semenoro  
Timothy Semenoro